

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARLES RICHARD HAILE, JR., : Civil Action No. 1:16-cv-08661-VEC
Individually and on Behalf of All Others :
Similarly Situated, : CLASS ACTION
Plaintiff, :
vs. :
ALLERGAN PLC, BRENTON L. :
SAUNDERS, PAUL M. BISARO, MARIA :
TERESA HILADO, and R. TODD JOYCE, :
Defendants. :
x

DAVID ROSENBERG, Individually and on : Civil Action No. 1:17-cv-00025
Behalf of All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
ALLERGAN PLC (f/k/a ACTAVIS PLC), :
BRENTON L. SAUNDERS, PAUL M. :
BISARO, MARIA TERESA HILADO and :
ROBERT TODD JOYCE, :
Defendants. :
x

**DECLARATION OF DAVID A. ROSENFELD IN SUPPORT OF MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL**

I, DAVID A. ROSENFELD, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the State of New York and this Court. I am a member of Robbins Geller Rudman & Dowd LLP, proposed lead counsel for proposed lead plaintiff Strathclyde Pension Fund (the “Pension Fund”) in the above-captioned actions. I make this declaration in support of the Pension Fund’s Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Lead Plaintiff’s Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of pendency of class action published in *Business Wire*, a widely circulated national business-oriented publication or wire service, on November 4, 2016;

Exhibit B: Press release published in *Globe Newswire* on November 8, 2016, announcing filing of *Haile v. Allergan plc* action in S.D.N.Y. and January 3, 2017 lead plaintiff motion deadline;

Exhibit C: Press release published in *PR Newswire* on November 18, 2016, reminding investors about *Haile v. Allergan plc* action in S.D.N.Y.;

Exhibit D: Press release published in *Globe Newswire* on November 25, 2016, reminding investors about *Haile v. Allergan plc* action in S.D.N.Y.;

Exhibit E: Press release published in *Globe Newswire* on December 26, 2016, reminding investors about *Haile v. Allergan plc* action in S.D.N.Y.;

Exhibit F: Press release published in *Marketwired* on January 3, 2017, announcing filing of *Rosenberg v. Allergan plc* action in S.D.N.Y. and January 3, 2017 lead plaintiff motion deadline;

Exhibit G: The Pension Fund’s Certification;

Exhibit H: The Pension Fund’s loss estimate; and

Exhibit I: Robbins Geller Rudman & Dowd LLP’s firm résumé.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of January, 2017, at Melville, New York.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 3, 2017.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

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Melville, NY 11747
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631/367-1173 (fax)

E-mail: drosenfeld@rgrdlaw.com

Mailing Information for a Case 1:16-cv-08661-VEC Haile, Jr. v. Allergan plc et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Joseph Alexander Hood , II**
ahood@pomlaw.com,abarbosa@pomlaw.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

Mailing Information for a Case 1:17-cv-00025 Rosenberg v. Allergan PLC (f/k/a Actavis PLC) et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Amalgamated Bank, as Trustee for the Longview Collective Investment Fund**
bhart@lowey.com
- **Jack Gerald Fruchter**
jfruchter@aftlaw.com
- **Barbara J. Hart**
bhart@lowey.com
- **Cassandra Lynn Porsch**
CPorsch@aftlaw.com

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